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VIA ECF

Honorable Judge Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

Re: *Brockmole, et al. v. EZ Festivals LLC, et al.*
Avchukov, et al. v. Avant Gardner LLC, et al.
Palie, et al. v. EZ Festivals LLC, et al.
Ting, et al. v. Avant Gardner LLC, et al.
Civil Action No.: 1:23-cv-08106 (MMG)(JW) (Consolidated)

Dear Judge Willis:

We represent Plaintiffs in *Brockmole, et al. v. EZ Festivals LLC, et al.* and write in response to defense counsel's September 30, 2024 letter. We believe that the request for a six-week adjournment of the October 8, 2024 settlement conference is unreasonable.

The Plaintiffs have only just received relevant data from EZ Festival after a lengthy delay but Plaintiffs' counsel have analyzed same and can tender a settlement demand in advance of the October 8, 2024 conference. If the Court should order an adjournment of that date, the Brockmole Plaintiffs request the Court set a deadline in advance of the new date for Plaintiffs to forward a demand to Defendants in writing and Defendants be ordered to respond. That will allow the parties and Court to have the same idea of the parameters in advance of the settlement conference.

Respectfully,

/s/ Lee Squitieri

LS:mm